

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ROWVAUGHN WELLS, Individually and as
Administratrix Ad Litem of the ESTATE OF
TYRE DEANDRE NICHOLS, deceased.

Case No. 2:23-CV-2224

Plaintiff,

v.

THE CITY OF MEMPHIS, a municipality;
CHIEF CERELYN DAVIS, in her official
capacity; EMMITT MARTIN III, in his
individual capacity; DEMETRIUS HALEY,
in his individual capacity; TADARRIUS BEAN,
in his individual capacity; PRESTON HEMPHILL,
in his individual capacity; ROBERT LONG,
in his individual capacity; JAMICHAEL SANDRIDGE,
in his individual capacity; MICHELLE WHITAKER,
in her individual capacity; DEWAYNE SMITH,
in his individual capacity and
as an agent of the City of Memphis,

Defendants.

ANSWER OF JAMICHEAL SANDRIDGE TO PLAINTIFF’S COMPLAINT AT LAW

COMES NOW, Defendant JaMicheal Sandridge (“Mr. Sandridge”) or (“Defendant”), and
submits this his Answer to Plaintiff’s Complaint at Law. In support thereof, Mr. Sandridge states
as follows:

Mr. Sandridge denies each and every allegation in Plaintiff’s Complaint not specifically
admitted as though each such denial was set forth word for word herein.

Plaintiff's Complaint contains a preliminary statement to which no response is required.

To the extent a response may be required, or if Mr. Sandridge's rights are affected by the

Plaintiff's preliminary statement, Defendant denies the same.

1. Defendant admits paragraph 1.
2. Defendant admits paragraph 2.
3. Defendant admits paragraph 3.
4. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 4 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
5. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 5 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
6. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 6 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
7. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 7 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
8. Defendant admits paragraph 8.
9. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 9 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

10. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 10 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
11. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 11 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
12. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 12 including sub-paragraphs a through e and to the extent Defendant's rights may be affected, he demands strict proof thereof.
13. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 13 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
14. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 14 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
15. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 15 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
16. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 16 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
17. Defendant admits the allegations in paragraph 17.

18. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 18 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
19. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 19 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
20. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 20 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
21. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 21 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
22. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 22 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
23. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 23 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
24. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 24 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

25. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 25 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
26. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 26 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
27. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 27 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
28. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 28 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
29. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 29 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
30. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 30 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
31. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 31 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

32. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 32 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
33. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 33 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
34. Defendant admits the allegations in paragraph 34.
35. Defendant admits the allegations in paragraph 35.
36. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 36 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
37. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 37 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
38. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 38 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
39. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 39 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

FACTUAL ALLEGATIONS

40. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 40 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
41. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 41 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
42. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 42 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
43. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 43 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
44. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 44 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
45. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 45 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
46. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 46 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

47. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 47 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

48. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 48 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

49. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 49 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

I. The City of Memphis' Decision to Hire Cerelyn Davis as Police Chief with Knowledge of Her History with Disbanded Police Suppression Units.

50. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 50 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

51. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 51 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

52. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 52 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

53. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 53 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

54. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 54 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
55. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 55 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
56. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 56 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
57. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 57 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
58. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 58 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
59. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 59 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
60. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 60 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

61. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 61 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
62. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 62 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
63. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 63 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
64. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 64 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
65. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 65 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
66. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 66 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
67. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 67 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

68. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 68 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

II. The City of Memphis' Creation of the SCORPION Unit; An Institutionalized Police Oppression Unit.

69. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 69 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

70. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 70 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

71. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 71 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

72. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 72 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

73. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 73 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

74. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 74 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

75. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 75 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
76. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 76 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
77. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 77 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
78. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 78 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
79. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 79 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
80. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 80 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
81. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 81 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

82. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 82 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
83. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 83 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
84. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 84 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
85. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 85 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
86. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 86 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
87. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 87 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
88. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 88 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

89. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 89 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

III. The SCORPION Unit's Sting is Unleashed on the City of Memphis

90. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 90 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

91. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 91 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

92. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 92 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

93. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 93 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

94. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 94 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

95. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 95 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

96. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 96 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
97. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 97 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
98. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 98 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
99. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 99 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
100. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 100 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
101. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 101 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
102. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 102 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

103. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 103 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
104. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 104 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
105. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 105 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
106. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 106 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
107. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 107 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
108. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 108 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
109. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 109 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

110. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 110 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

IV. The City of Memphis' Staff of the SCORPION Unit and the Broader Indifference to Hiring Standards and Training Within the Memphis Police Department

111. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 111 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
112. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 112 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
113. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 113 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
114. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 114 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
115. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 115 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
116. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 116 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

117. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 117 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
118. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 118 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
119. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 119 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
120. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 120 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
121. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 121 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
122. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 122 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
123. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 123 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

124. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 124 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
125. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 125 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
126. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 126 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
127. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 127 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
128. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 128 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
129. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 129 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
130. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 130 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

131. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 131 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
132. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 132 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
133. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 133 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
134. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 134 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
135. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 135 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
136. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 136 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
137. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 137 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

138. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 138 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

V. The City of Memphis' Indifference to the SCORPION Unit's Unsupervised Reign of Terror

139. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 139 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
140. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 140 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
141. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 141 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
142. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 142 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
143. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 143 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
144. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 144 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

VI. The Baseless Stop: Consistent with Chief Davis' Directive, the SCORPION Unit Stops Tyre Nichols Without Legal Justification

145. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 145 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
146. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 146 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
147. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 147 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
148. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 148 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
149. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 149 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
150. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 150 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
151. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 151 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

152. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 152 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
153. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 153 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
154. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 154 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
155. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 155 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
156. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 156 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
157. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 157 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
158. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 158 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

159. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 159 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
160. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 160 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
161. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 161 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
162. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 162 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
163. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 163 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
164. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 164 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
165. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 165 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

166. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 166 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
167. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 167 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
168. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 168 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
169. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 169 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
170. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 170 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
171. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 171 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
172. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 172 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

173. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 173 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
174. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 174 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
175. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 175 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
176. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 176 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
177. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 177 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
178. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 178 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
179. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 179 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

180. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 180 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
181. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 181 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
182. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 182 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
183. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 183 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
184. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 184 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
185. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 185 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
186. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 186 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

187. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 187 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
188. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 188 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
189. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 189 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
190. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 190 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
191. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 191 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
192. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 192 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
193. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 193 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

194. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 194 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

195. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 195 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

196. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 196 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

VII. The Capture and the Retaliation: the Gang of SCORPION Unit Officers Beat Tyre Within an Inch of His Life

197. Defendant is without sufficient knowledge to admit or deny paragraph 197 and would demand strict proof if his rights are to be affected.

198. Defendant is without sufficient knowledge to admit or deny paragraph 198 and would demand strict proof if his rights are to be affected.

199. Defendant is without sufficient knowledge to admit or deny paragraph 199 and would demand strict proof if his rights are to be affected.

200. Defendant is without sufficient knowledge to admit or deny paragraph 200 and would demand strict proof if his rights are to be affected.

201. Defendant is without sufficient knowledge to admit or deny paragraph 201 and would demand strict proof if his rights are to be affected.

202. Defendant is without sufficient knowledge to admit or deny paragraph 202 and would demand strict proof if his rights are to be affected.

- 203. Defendant is without sufficient knowledge to admit or deny paragraph 203 and would demand strict proof if his rights are to be affected.
- 204. Defendant is without sufficient knowledge to admit or deny paragraph 204 and would demand strict proof if his rights are to be affected.
- 205. Defendant is without sufficient knowledge to admit or deny paragraph 205 and would demand strict proof if his rights are to be affected.
- 206. Defendant is without sufficient knowledge to admit or deny paragraph 206 and would demand strict proof if his rights are to be affected.
- 207. Defendant is without sufficient knowledge to admit or deny paragraph 207 and would demand strict proof if his rights are to be affected.
- 208. Defendant is without sufficient knowledge to admit or deny paragraph 208 and would demand strict proof if his rights are to be affected.
- 209. Defendant is without sufficient knowledge to admit or deny paragraph 209 and would demand strict proof if his rights are to be affected.
- 210. Defendant is without sufficient knowledge to admit or deny paragraph 210 and would demand strict proof if his rights are to be affected.
- 211. Defendant is without sufficient knowledge to admit or deny paragraph 211 and would demand strict proof if his rights are to be affected.
- 212. Defendant is without sufficient knowledge to admit or deny paragraph 212 and would demand strict proof if his rights are to be affected.
- 213. Defendant is without sufficient knowledge to admit or deny paragraph 213 and would demand strict proof if his rights are to be affected.

214. Defendant is without sufficient knowledge to admit or deny paragraph 214 and would demand strict proof if his rights are to be affected.

215. Defendant is without sufficient knowledge to admit or deny paragraph 215 and would demand strict proof if his rights are to be affected.

216. Defendant is without sufficient knowledge to admit or deny paragraph 216 and would demand strict proof if his rights are to be affected.

217. Defendant is without sufficient knowledge to admit or deny paragraph 217 and would demand strict proof if his rights are to be affected.

218. Defendant is without sufficient knowledge to admit or deny paragraph 218 and would demand strict proof if his rights are to be affected.

219. Defendant is without sufficient knowledge to admit or deny paragraph 219 and would demand strict proof if his rights are to be affected.

220. Defendant is without sufficient knowledge to admit or deny paragraph 220 and would demand strict proof if his rights are to be affected.

221. Defendant is without sufficient knowledge to admit or deny paragraph 221 and would demand strict proof if his rights are to be affected.

222. Defendant is without sufficient knowledge to admit or deny paragraph 222 and would demand strict proof if his rights are to be affected.

VIII. The Aftermath: The Indifference of SCORPION Unit Officers, MPD Officers, MFD Agents, and Others Contribute to Tyre's Death

223. Defendant is without sufficient knowledge to admit or deny paragraph 223 and would demand strict proof if his rights are to be affected.

- 224. Defendant is without sufficient knowledge to admit or deny paragraph 224 and would demand strict proof if his rights are to be affected.
- 225. Defendant is without sufficient knowledge to admit or deny paragraph 225 and would demand strict proof if his rights are to be affected.
- 226. Defendant is without sufficient knowledge to admit or deny paragraph 226 and would demand strict proof if his rights are to be affected.
- 227. Defendant is without sufficient knowledge to admit or deny paragraph 227 and would demand strict proof if his rights are to be affected.
- 228. Defendant is without sufficient knowledge to admit or deny paragraph 228 and would demand strict proof if his rights are to be affected.
- 229. Defendant is without sufficient knowledge to admit or deny paragraph 229 and would demand strict proof if his rights are to be affected.
- 230. Defendant is without sufficient knowledge to admit or deny paragraph 230 and would demand strict proof if his rights are to be affected.
- 231. Defendant is without sufficient knowledge to admit or deny paragraph 231 and would demand strict proof if his rights are to be affected.
- 232. Defendant is without sufficient knowledge to admit or deny paragraph 232 and would demand strict proof if his rights are to be affected.
- 233. Defendant is without sufficient knowledge to admit or deny paragraph 233 and would demand strict proof if his rights are to be affected.
- 234. Defendant is without sufficient knowledge to admit or deny paragraph 234 and would demand strict proof if his rights are to be affected.

- 235. Defendant is without sufficient knowledge to admit or deny paragraph 235 and would demand strict proof if his rights are to be affected.
- 236. Defendant denies the allegations in paragraph 236.
- 237. Defendant denies the allegations in paragraph 237.
- 238. Defendant is without sufficient knowledge to admit or deny paragraph 238 and would demand strict proof if his rights are to be affected.
- 239. Defendant admits paragraph 239.
- 240. Defendant admits paragraph 240.
- 241. Defendant denies paragraph 241.
- 242. Defendant denies paragraph 242.
- 243. Defendant denies paragraph 243.
- 244. Defendant denies paragraph 244.
- 245. Defendant denies paragraph 245.
- 246. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 246 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
- 247. Defendant denies paragraph 247 as stated.
- 248. Defendant denies that EMT's did not address his physical state Defendant is without sufficient knowledge to admit or deny the remaining allegations in paragraph 248 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
- 249. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 249 and to the extent Defendant's rights may be affected, he demands strict proof thereof.

- 250. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 250 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
- 251. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 251 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
- 252. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 252 and to the extent Defendant's rights may be affected, he demands strict proof thereof.
- 253. Defendant denies paragraph 253 as stated.
- 254. Defendant admits Mr. Nichols was transported to the hospital.

IX. The Late Arrival of Lieutenant DeWayne Smith and the Misrepresentation and Lies to Row Vaughan Wells

- 255. Defendant is without sufficient knowledge to admit or deny paragraph 255 and would demand strict proof if his rights are to be affected.
- 256. Defendant is without sufficient knowledge to admit or deny paragraph 256 and would demand strict proof if his rights are to be affected.
- 257. Defendant is without sufficient knowledge to admit or deny paragraph 257 and would demand strict proof if his rights are to be affected.
- 258. Defendant is without sufficient knowledge to admit or deny paragraph 258 and would demand strict proof if his rights are to be affected.
- 259. Defendant is without sufficient knowledge to admit or deny paragraph 259 and would demand strict proof if his rights are to be affected.

- 260. Defendant is without sufficient knowledge to admit or deny paragraph 260 and would demand strict proof if his rights are to be affected.
- 261. Defendant is without sufficient knowledge to admit or deny paragraph 261 and would demand strict proof if his rights are to be affected.
- 262. Defendant is without sufficient knowledge to admit or deny paragraph 262 and would demand strict proof if his rights are to be affected.
- 263. Defendant is without sufficient knowledge to admit or deny paragraph 263 and would demand strict proof if his rights are to be affected.
- 264. Defendant is without sufficient knowledge to admit or deny paragraph 264 and would demand strict proof if his rights are to be affected.
- 265. Defendant is without sufficient knowledge to admit or deny paragraph 265 and would demand strict proof if his rights are to be affected.
- 266. Defendant is without sufficient knowledge to admit or deny paragraph 266 and would demand strict proof if his rights are to be affected.
- 267. Defendant is without sufficient knowledge to admit or deny paragraph 267 and would demand strict proof if his rights are to be affected.
- 268. Defendant is without sufficient knowledge to admit or deny paragraph 268 and would demand strict proof if his rights are to be affected.
- 269. Defendant is without sufficient knowledge to admit or deny paragraph 269 and would demand strict proof if his rights are to be affected.
- 270. Defendant is without sufficient knowledge to admit or deny paragraph 270 and would demand strict proof if his rights are to be affected.

- 271. Defendant is without sufficient knowledge to admit or deny paragraph 271 and would demand strict proof if his rights are to be affected.
- 272. Defendant is without sufficient knowledge to admit or deny paragraph 272 and would demand strict proof if his rights are to be affected.
- 273. Defendant is without sufficient knowledge to admit or deny paragraph 273 and would demand strict proof if his rights are to be affected.
- 274. Defendant is without sufficient knowledge to admit or deny paragraph 274 and would demand strict proof if his rights are to be affected.
- 275. Defendant is without sufficient knowledge to admit or deny paragraph 275 and would demand strict proof if his rights are to be affected.
- 276. Defendant is without sufficient knowledge to admit or deny paragraph 276 and would demand strict proof if his rights are to be affected.
- 277. Defendant is without sufficient knowledge to admit or deny paragraph 277 and would demand strict proof if his rights are to be affected.
- 278. Defendant is without sufficient knowledge to admit or deny paragraph 278 and would demand strict proof if his rights are to be affected.
- 279. Defendant is without sufficient knowledge to admit or deny paragraph 279 and would demand strict proof if his rights are to be affected.
- 280. Defendant is without sufficient knowledge to admit or deny paragraph 280 and would demand strict proof if his rights are to be affected.
- 281. Defendant is without sufficient knowledge to admit or deny paragraph 281 and would demand strict proof if his rights are to be affected.

282. Defendant is without sufficient knowledge to admit or deny paragraph 282 and would demand strict proof if his rights are to be affected.

X. The Original Five SCORPION Unit Officer's Use of Excessive Force and Failure to Intervene in the Use of Excessive Force Contributes to Tyre's Death

283. Defendant is without sufficient knowledge to admit or deny paragraph 283 and would demand strict proof if his rights are to be affected.

284. Defendant is without sufficient knowledge to admit or deny paragraph 284 and would demand strict proof if his rights are to be affected.

285. Defendant is without sufficient knowledge to admit or deny paragraph 285 and would demand strict proof if his rights are to be affected.

286. Defendant is without sufficient knowledge to admit or deny paragraph 286 and would demand strict proof if his rights are to be affected.

287. Defendant is without sufficient knowledge to admit or deny paragraph 287 and would demand strict proof if his rights are to be affected.

288. Defendant is without sufficient knowledge to admit or deny paragraph 288 and would demand strict proof if his rights are to be affected.

289. Defendant is without sufficient knowledge to admit or deny paragraph 289 and would demand strict proof if his rights are to be affected.

290. Defendant is without sufficient knowledge to admit or deny paragraph 290 and would demand strict proof if his rights are to be affected.

291. Defendant is without sufficient knowledge to admit or deny paragraph 291 and would demand strict proof if his rights are to be affected.

292. Defendant is without sufficient knowledge to admit or deny paragraph 292 and would demand strict proof if his rights are to be affected.

293. Defendant denies paragraph 293.

CAUSE OF ACTION

COUNT 1 – 42 U.S.C. § 1983 – Monell Claim- Official Policy

294. Paragraph 294 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

295. Defendant is without sufficient knowledge to admit or deny paragraph 295 and would demand strict proof if his rights are to be affected.

296. Defendant is without sufficient knowledge to admit or deny paragraph 296 and would demand strict proof if his rights are to be affected.

297. Defendant is without sufficient knowledge to admit or deny paragraph 297 and would demand strict proof if his rights are to be affected.

298. Defendant is without sufficient knowledge to admit or deny paragraph 298 and would demand strict proof if his rights are to be affected.

299. Defendant is without sufficient knowledge to admit or deny paragraph 299 and would demand strict proof if his rights are to be affected.

300. Defendant is without sufficient knowledge to admit or deny paragraph 300 and would demand strict proof if his rights are to be affected.

301. Defendant is without sufficient knowledge to admit or deny paragraph 301 and would demand strict proof if his rights are to be affected.

302. Defendant is without sufficient knowledge to admit or deny paragraph 302 and would demand strict proof if his rights are to be affected.

303. Defendant is without sufficient knowledge to admit or deny paragraph 303 and would demand strict proof if his rights are to be affected.
304. Defendant is without sufficient knowledge to admit or deny paragraph 304 and would demand strict proof if his rights are to be affected.
305. Defendant is without sufficient knowledge to admit or deny paragraph 305 and would demand strict proof if his rights are to be affected.
306. Defendant is without sufficient knowledge to admit or deny paragraph 306 and would demand strict proof if his rights are to be affected.
307. Defendant is without sufficient knowledge to admit or deny paragraph 307 and would demand strict proof if his rights are to be affected.
308. Defendant is without sufficient knowledge to admit or deny paragraph 308 and would demand strict proof if his rights are to be affected.
309. Defendant is without sufficient knowledge to admit or deny paragraph 309 and would demand strict proof if his rights are to be affected.
310. Defendant is without sufficient knowledge to admit or deny paragraph 310 and would demand strict proof if his rights are to be affected.

COUNT II - 42 U.S.C. §1983 – *Monell* Claim - Custom of Tolerance
Plaintiff v. Chief Cerelyn Davis, in her official capacity (City of Memphis)

311. Paragraph 311 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
312. Defendant is without sufficient knowledge to admit or deny paragraph 312 and would demand strict proof if his rights are to be affected.
313. Defendant is without sufficient knowledge to admit or deny paragraph 313 and would demand strict proof if his rights are to be affected.

314. Defendant is without sufficient knowledge to admit or deny paragraph 314 and would demand strict proof if his rights are to be affected.
315. Defendant is without sufficient knowledge to admit or deny paragraph 315 and would demand strict proof if his rights are to be affected.
316. Defendant is without sufficient knowledge to admit or deny paragraph 316 and would demand strict proof if his rights are to be affected.
317. Defendant is without sufficient knowledge to admit or deny paragraph 317 and would demand strict proof if his rights are to be affected.
318. Defendant is without sufficient knowledge to admit or deny paragraph 318 and would demand strict proof if his rights are to be affected.
319. Defendant is without sufficient knowledge to admit or deny paragraph 319 and would demand strict proof if his rights are to be affected.
320. Defendant is without sufficient knowledge to admit or deny paragraph 320 and would demand strict proof if his rights are to be affected.
321. Defendant is without sufficient knowledge to admit or deny paragraph 321 and would demand strict proof if his rights are to be affected.
322. Defendant is without sufficient knowledge to admit or deny paragraph 322 and would demand strict proof if his rights are to be affected.
323. Defendant is without sufficient knowledge to admit or deny paragraph 323 and would demand strict proof if his rights are to be affected.
324. Defendant is without sufficient knowledge to admit or deny paragraph 324 and would demand strict proof if his rights are to be affected.

COUNT III – 42 U.S.C. §1983- Monell Claim – Failure to Train
Plaintiff v. Chief Cerelyn Davis, in her official capacity (City of Memphis)

325. Paragraph 325 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
326. Defendant is without sufficient knowledge to admit or deny paragraph 326 and would demand strict proof if his rights are to be affected.
327. Defendant is without sufficient knowledge to admit or deny paragraph 327 and would demand strict proof if his rights are to be affected.
328. Defendant is without sufficient knowledge to admit or deny paragraph 328 and would demand strict proof if his rights are to be affected.
329. Defendant is without sufficient knowledge to admit or deny paragraph 329 and would demand strict proof if his rights are to be affected.
330. Defendant is without sufficient knowledge to admit or deny paragraph 330 and would demand strict proof if his rights are to be affected.
331. Defendant is without sufficient knowledge to admit or deny paragraph 331 and would demand strict proof if his rights are to be affected.
332. Defendant is without sufficient knowledge to admit or deny paragraph 332 and would demand strict proof if his rights are to be affected.
333. Defendant is without sufficient knowledge to admit or deny paragraph 333 and would demand strict proof if his rights are to be affected.
334. Defendant is without sufficient knowledge to admit or deny paragraph 334 and would demand strict proof if his rights are to be affected.
335. Defendant is without sufficient knowledge to admit or deny paragraph 335 and would demand strict proof if his rights are to be affected.

- 336. Defendant is without sufficient knowledge to admit or deny paragraph 336 and would demand strict proof if his rights are to be affected.
- 337. Defendant is without sufficient knowledge to admit or deny paragraph 337 and would demand strict proof if his rights are to be affected.
- 338. Defendant is without sufficient knowledge to admit or deny paragraph 338 and would demand strict proof if his rights are to be affected.
- 339. Defendant is without sufficient knowledge to admit or deny paragraph 339 and would demand strict proof if his rights are to be affected.
- 340. Defendant is without sufficient knowledge to admit or deny paragraph 340 and would demand strict proof if his rights are to be affected.
- 341. Defendant is without sufficient knowledge to admit or deny paragraph 341 and would demand strict proof if his rights are to be affected.
- 342. Defendant is without sufficient knowledge to admit or deny paragraph 342 and would demand strict proof if his rights are to be affected.
- 343. Defendant is without sufficient knowledge to admit or deny paragraph 343 and would demand strict proof if his rights are to be affected.
- 344. Defendant is without sufficient knowledge to admit or deny paragraph 344 and would demand strict proof if his rights are to be affected.
- 345. Defendant is without sufficient knowledge to admit or deny paragraph 345 and would demand strict proof if his rights are to be affected.
- 346. Defendant is without sufficient knowledge to admit or deny paragraph 346 and would demand strict proof if his rights are to be affected.

347. Defendant is without sufficient knowledge to admit or deny paragraph 347 and would demand strict proof if his rights are to be affected.

348. Defendant is without sufficient knowledge to admit or deny paragraph 348 and would demand strict proof if his rights are to be affected.

349. Defendant is without sufficient knowledge to admit or deny paragraph 349 and would demand strict proof if his rights are to be affected.

COUNT IV – 42 U.S.C. §1983 – Monell Claim – Failure to Supervise
Plaintiff v. Chief Cerelyn Davis in her official capacity (City of Memphis)

350. Paragraph 350 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

351. Defendant is without sufficient knowledge to admit or deny paragraph 351 and would demand strict proof if his rights are to be affected.

352. Defendant is without sufficient knowledge to admit or deny paragraph 352 and would demand strict proof if his rights are to be affected.

353. Defendant is without sufficient knowledge to admit or deny paragraph 353 and would demand strict proof if his rights are to be affected.

354. Defendant is without sufficient knowledge to admit or deny paragraph 354 and would demand strict proof if his rights are to be affected.

355. Defendant is without sufficient knowledge to admit or deny paragraph 355 and would demand strict proof if his rights are to be affected.

356. Defendant is without sufficient knowledge to admit or deny paragraph 356 and would demand strict proof if his rights are to be affected.

357. Defendant is without sufficient knowledge to admit or deny paragraph 357 and would demand strict proof if his rights are to be affected.

- 358. Defendant is without sufficient knowledge to admit or deny paragraph 358 and would demand strict proof if his rights are to be affected.
- 359. Defendant is without sufficient knowledge to admit or deny paragraph 359 and would demand strict proof if his rights are to be affected.
- 360. Defendant is without sufficient knowledge to admit or deny paragraph 360 and would demand strict proof if his rights are to be affected.
- 361. Defendant is without sufficient knowledge to admit or deny paragraph 361 and would demand strict proof if his rights are to be affected.
- 362. Defendant is without sufficient knowledge to admit or deny paragraph 362 and would demand strict proof if his rights are to be affected.
- 363. Defendant is without sufficient knowledge to admit or deny paragraph 363 and would demand strict proof if his rights are to be affected.
- 364. Defendant is without sufficient knowledge to admit or deny paragraph 364 and would demand strict proof if his rights are to be affected.
- 365. Defendant is without sufficient knowledge to admit or deny paragraph 365 and would demand strict proof if his rights are to be affected.
- 366. Defendant is without sufficient knowledge to admit or deny paragraph 366 and would demand strict proof if his rights are to be affected.
- 367. Defendant is without sufficient knowledge to admit or deny paragraph 367 and would demand strict proof if his rights are to be affected.
- 368. Defendant is without sufficient knowledge to admit or deny paragraph 368 and would demand strict proof if his rights are to be affected.

369. Defendant is without sufficient knowledge to admit or deny paragraph 369 and would demand strict proof if his rights are to be affected.
370. Defendant is without sufficient knowledge to admit or deny paragraph 370 and would demand strict proof if his rights are to be affected.
371. Defendant is without sufficient knowledge to admit or deny paragraph 371 and would demand strict proof if his rights are to be affected.
372. Defendant is without sufficient knowledge to admit or deny paragraph 372 and would demand strict proof if his rights are to be affected.
373. Defendant is without sufficient knowledge to admit or deny paragraph 373 and would demand strict proof if his rights are to be affected.
374. Defendant is without sufficient knowledge to admit or deny paragraph 374 and would demand strict proof if his rights are to be affected.
375. Defendant is without sufficient knowledge to admit or deny paragraph 375 and would demand strict proof if his rights are to be affected.
376. Defendant is without sufficient knowledge to admit or deny paragraph 376 and would demand strict proof if his rights are to be affected.

COUNT V – 42 U.S.C. §1983 – Fourth Amendment Violation: Unreasonable Stop
Plaintiff v. Emmitt Martin III in his individual capacity

377. Paragraph 377 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
378. Defendant is without sufficient knowledge to admit or deny paragraph 378 and would demand strict proof if his rights are to be affected.
379. Defendant is without sufficient knowledge to admit or deny paragraph 379 and would demand strict proof if his rights are to be affected.

- 380. Defendant is without sufficient knowledge to admit or deny paragraph 380 and would demand strict proof if his rights are to be affected.
- 381. Defendant is without sufficient knowledge to admit or deny paragraph 381 and would demand strict proof if his rights are to be affected.
- 382. Defendant is without sufficient knowledge to admit or deny paragraph 382 and would demand strict proof if his rights are to be affected.
- 383. Defendant is without sufficient knowledge to admit or deny paragraph 383 and would demand strict proof if his rights are to be affected.
- 384. Defendant is without sufficient knowledge to admit or deny paragraph 384 and would demand strict proof if his rights are to be affected.
- 385. Defendant is without sufficient knowledge to admit or deny paragraph 385 and would demand strict proof if his rights are to be affected.
- 386. Defendant is without sufficient knowledge to admit or deny paragraph 386 and would demand strict proof if his rights are to be affected.
- 387. Defendant is without sufficient knowledge to admit or deny paragraph 387 and would demand strict proof if his rights are to be affected.
- 388. Defendant is without sufficient knowledge to admit or deny paragraph 388 and would demand strict proof if his rights are to be affected.
- 389. Defendant is without sufficient knowledge to admit or deny paragraph 389 and would demand strict proof if his rights are to be affected.
- 390. Defendant is without sufficient knowledge to admit or deny paragraph 390 and would demand strict proof if his rights are to be affected.

391. Defendant is without sufficient knowledge to admit or deny paragraph 391 and would demand strict proof if his rights are to be affected.

392. Defendant is without sufficient knowledge to admit or deny paragraph 392 and would demand strict proof if his rights are to be affected.

393. Defendant is without sufficient knowledge to admit or deny paragraph 393 and would demand strict proof if his rights are to be affected.

394. Defendant is without sufficient knowledge to admit or deny paragraph 394 and would demand strict proof if his rights are to be affected.

395. Defendant is without sufficient knowledge to admit or deny paragraph 395 and would demand strict proof if his rights are to be affected.

396. Defendant is without sufficient knowledge to admit or deny paragraph 396 and would demand strict proof if his rights are to be affected.

397. Defendant is without sufficient knowledge to admit or deny paragraph 397 and would demand strict proof if his rights are to be affected.

398. Defendant is without sufficient knowledge to admit or deny paragraph 398 and would demand strict proof if his rights are to be affected.

399. Defendant is without sufficient knowledge to admit or deny paragraph 399 and would demand strict proof if his rights are to be affected.

COUNT VI – 42 U.S.C. 1983 – Fourth Amendment Violation: Excessive Force
Plaintiff v. Emmitt Martin III, in his individual capacity

400. Paragraph 400 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

401. Defendant is without sufficient knowledge to admit or deny paragraph 401 and would demand strict proof if his rights are to be affected.

- 402. Defendant is without sufficient knowledge to admit or deny paragraph 402 and would demand strict proof if his rights are to be affected.
- 403. Defendant is without sufficient knowledge to admit or deny paragraph 403 and would demand strict proof if his rights are to be affected.
- 404. Defendant is without sufficient knowledge to admit or deny paragraph 404 and would demand strict proof if his rights are to be affected.
- 405. Defendant is without sufficient knowledge to admit or deny paragraph 405 and would demand strict proof if his rights are to be affected.
- 406. Defendant is without sufficient knowledge to admit or deny paragraph 406 and would demand strict proof if his rights are to be affected.
- 407. Defendant is without sufficient knowledge to admit or deny paragraph 407 and would demand strict proof if his rights are to be affected.
- 408. Defendant is without sufficient knowledge to admit or deny paragraph 408 and would demand strict proof if his rights are to be affected.
- 409. Defendant is without sufficient knowledge to admit or deny paragraph 409 and would demand strict proof if his rights are to be affected.
- 410. Defendant is without sufficient knowledge to admit or deny paragraph 410 and would demand strict proof if his rights are to be affected.
- 411. Defendant is without sufficient knowledge to admit or deny paragraph 411 and would demand strict proof if his rights are to be affected.
- 412. Defendant is without sufficient knowledge to admit or deny paragraph 412 and would demand strict proof if his rights are to be affected.

- 413. Defendant is without sufficient knowledge to admit or deny paragraph 413 and would demand strict proof if his rights are to be affected.
- 414. Defendant is without sufficient knowledge to admit or deny paragraph 414 and would demand strict proof if his rights are to be affected.
- 415. Defendant is without sufficient knowledge to admit or deny paragraph 415 and would demand strict proof if his rights are to be affected.
- 416. Defendant is without sufficient knowledge to admit or deny paragraph 416 and would demand strict proof if his rights are to be affected.
- 417. Defendant is without sufficient knowledge to admit or deny paragraph 417 and would demand strict proof if his rights are to be affected.
- 418. Defendant is without sufficient knowledge to admit or deny paragraph 418 and would demand strict proof if his rights are to be affected.
- 419. Defendant is without sufficient knowledge to admit or deny paragraph 419 and would demand strict proof if his rights are to be affected.
- 420. Defendant is without sufficient knowledge to admit or deny paragraph 420 and would demand strict proof if his rights are to be affected.
- 421. Defendant is without sufficient knowledge to admit or deny paragraph 421 and would demand strict proof if his rights are to be affected.
- 422. Defendant is without sufficient knowledge to admit or deny paragraph 422 and would demand strict proof if his rights are to be affected.
- 423. Defendant is without sufficient knowledge to admit or deny paragraph 423 and would demand strict proof if his rights are to be affected.

424. Defendant is without sufficient knowledge to admit or deny paragraph 424 and would demand strict proof if his rights are to be affected.

425. Defendant is without sufficient knowledge to admit or deny paragraph 425 and would demand strict proof if his rights are to be affected.

COUNT VII – 42 U.S.C. §1983 – Fourth Amendment Violation: Failure to Intervene to Prevent Excessive Force

Plaintiff v. Emmitt Martin III, in his individual capacity

426. Paragraph 426 does not require a response. To the extent a response is required, Defendant incorporates his responses to paragraphs 1-293.

427. Defendant is without sufficient knowledge to admit or deny paragraph 427 and would demand strict proof if his rights are to be affected.

428. Defendant is without sufficient knowledge to admit or deny paragraph 428 and would demand strict proof if his rights are to be affected.

429. Defendant is without sufficient knowledge to admit or deny paragraph 429 and would demand strict proof if his rights are to be affected.

430. Defendant is without sufficient knowledge to admit or deny paragraph 430 and would demand strict proof if his rights are to be affected.

431. Defendant is without sufficient knowledge to admit or deny paragraph 431 and would demand strict proof if his rights are to be affected.

432. Defendant is without sufficient knowledge to admit or deny paragraph 432 and would demand strict proof if his rights are to be affected.

433. Defendant is without sufficient knowledge to admit or deny paragraph 433 and would demand strict proof if his rights are to be affected.

- 434. Defendant is without sufficient knowledge to admit or deny paragraph 434 and would demand strict proof if his rights are to be affected.
- 435. Defendant is without sufficient knowledge to admit or deny paragraph 435 and would demand strict proof if his rights are to be affected.
- 436. Defendant is without sufficient knowledge to admit or deny paragraph 436 and would demand strict proof if his rights are to be affected.
- 437. Defendant is without sufficient knowledge to admit or deny paragraph 437 and would demand strict proof if his rights are to be affected.
- 438. Defendant is without sufficient knowledge to admit or deny paragraph 438 and would demand strict proof if his rights are to be affected.
- 439. Defendant is without sufficient knowledge to admit or deny paragraph 439 and would demand strict proof if his rights are to be affected.
- 440. Defendant is without sufficient knowledge to admit or deny paragraph 440 and would demand strict proof if his rights are to be affected.
- 441. Defendant is without sufficient knowledge to admit or deny paragraph 441 and would demand strict proof if his rights are to be affected.
- 442. Defendant is without sufficient knowledge to admit or deny paragraph 442 and would demand strict proof if his rights are to be affected.
- 443. Defendant is without sufficient knowledge to admit or deny paragraph 443 and would demand strict proof if his rights are to be affected.
- 444. Defendant is without sufficient knowledge to admit or deny paragraph 444 and would demand strict proof if his rights are to be affected.

445. Defendant is without sufficient knowledge to admit or deny paragraph 445 and would demand strict proof if his rights are to be affected.
446. Defendant is without sufficient knowledge to admit or deny paragraph 446 and would demand strict proof if his rights are to be affected.
447. Defendant is without sufficient knowledge to admit or deny paragraph 447 and would demand strict proof if his rights are to be affected.
448. Defendant is without sufficient knowledge to admit or deny paragraph 448 and would demand strict proof if his rights are to be affected.
449. Defendant is without sufficient knowledge to admit or deny paragraph 449 and would demand strict proof if his rights are to be affected.
450. Defendant is without sufficient knowledge to admit or deny paragraph 450 and would demand strict proof if his rights are to be affected.
451. Defendant is without sufficient knowledge to admit or deny paragraph 451 and would demand strict proof if his rights are to be affected.

COUNT VIII- 42 U.S.C. §1983 – Fourth Amendment Violation: Unreasonable Stop
Plaintiff v. Demetrius Haley, in his individual capacity

452. Paragraph 452 does not require a response. To the extent a response is required, Defendant incorporates his responses to paragraphs 1-293.
453. Defendant is without sufficient knowledge to admit or deny paragraph 453 and would demand strict proof if his rights are to be affected.
454. Defendant is without sufficient knowledge to admit or deny paragraph 454 and would demand strict proof if his rights are to be affected.
455. Defendant is without sufficient knowledge to admit or deny paragraph 455 and would demand strict proof if his rights are to be affected.

- 456. Defendant is without sufficient knowledge to admit or deny paragraph 456 and would demand strict proof if his rights are to be affected.
- 457. Defendant is without sufficient knowledge to admit or deny paragraph 457 and would demand strict proof if his rights are to be affected.
- 458. Defendant is without sufficient knowledge to admit or deny paragraph 458 and would demand strict proof if his rights are to be affected.
- 459. Defendant is without sufficient knowledge to admit or deny paragraph 459 and would demand strict proof if his rights are to be affected.
- 460. Defendant is without sufficient knowledge to admit or deny paragraph 460 and would demand strict proof if his rights are to be affected.
- 461. Defendant is without sufficient knowledge to admit or deny paragraph 461 and would demand strict proof if his rights are to be affected.
- 462. Defendant is without sufficient knowledge to admit or deny paragraph 462 and would demand strict proof if his rights are to be affected.
- 463. Defendant is without sufficient knowledge to admit or deny paragraph 463 and would demand strict proof if his rights are to be affected.
- 464. Defendant is without sufficient knowledge to admit or deny paragraph 464 and would demand strict proof if his rights are to be affected.
- 465. Defendant is without sufficient knowledge to admit or deny paragraph 465 and would demand strict proof if his rights are to be affected.
- 466. Defendant is without sufficient knowledge to admit or deny paragraph 466 and would demand strict proof if his rights are to be affected.

467. Defendant is without sufficient knowledge to admit or deny paragraph 467 and would demand strict proof if his rights are to be affected.
468. Defendant is without sufficient knowledge to admit or deny paragraph 468 and would demand strict proof if his rights are to be affected.
469. Defendant is without sufficient knowledge to admit or deny paragraph 469 and would demand strict proof if his rights are to be affected.
470. Defendant is without sufficient knowledge to admit or deny paragraph 470 and would demand strict proof if his rights are to be affected.
471. Defendant is without sufficient knowledge to admit or deny paragraph 471 and would demand strict proof if his rights are to be affected.
472. Defendant is without sufficient knowledge to admit or deny paragraph 472 and would demand strict proof if his rights are to be affected.
473. Defendant is without sufficient knowledge to admit or deny paragraph 473 and would demand strict proof if his rights are to be affected.
474. Defendant is without sufficient knowledge to admit or deny paragraph 474 and would demand strict proof if his rights are to be affected.

COUNT IX - 42 U.S.C. § 1983- Fourth Amendment: Excessive Force
Plaintiff v. Demetrius Haley, in his individual capacity

475. Paragraph 475 does not require a response. To the extent a response is required, Defendant incorporates his responses to paragraphs 1-293.
476. Defendant is without sufficient knowledge to admit or deny paragraph 476 and would demand strict proof if his rights are to be affected.
477. Defendant is without sufficient knowledge to admit or deny paragraph 477 and would demand strict proof if his rights are to be affected.

- 478. Defendant is without sufficient knowledge to admit or deny paragraph 478 and would demand strict proof if his rights are to be affected.
- 479. Defendant is without sufficient knowledge to admit or deny paragraph 479 and would demand strict proof if his rights are to be affected.
- 480. Defendant is without sufficient knowledge to admit or deny paragraph 480 and would demand strict proof if his rights are to be affected.
- 481. Defendant is without sufficient knowledge to admit or deny paragraph 481 and would demand strict proof if his rights are to be affected.
- 482. Defendant is without sufficient knowledge to admit or deny paragraph 482 and would demand strict proof if his rights are to be affected.
- 483. Defendant is without sufficient knowledge to admit or deny paragraph 483 and would demand strict proof if his rights are to be affected.
- 484. Defendant is without sufficient knowledge to admit or deny paragraph 484 and would demand strict proof if his rights are to be affected.
- 485. Defendant is without sufficient knowledge to admit or deny paragraph 485 and would demand strict proof if his rights are to be affected.
- 486. Defendant is without sufficient knowledge to admit or deny paragraph 486 and would demand strict proof if his rights are to be affected.
- 487. Defendant is without sufficient knowledge to admit or deny paragraph 487 and would demand strict proof if his rights are to be affected.
- 488. Defendant is without sufficient knowledge to admit or deny paragraph 488 and would demand strict proof if his rights are to be affected.

- 489. Defendant is without sufficient knowledge to admit or deny paragraph 489 and would demand strict proof if his rights are to be affected.
- 490. Defendant is without sufficient knowledge to admit or deny paragraph 490 and would demand strict proof if his rights are to be affected.
- 491. Defendant is without sufficient knowledge to admit or deny paragraph 491 and would demand strict proof if his rights are to be affected.
- 492. Defendant is without sufficient knowledge to admit or deny paragraph 492 and would demand strict proof if his rights are to be affected.
- 493. Defendant is without sufficient knowledge to admit or deny paragraph 493 and would demand strict proof if his rights are to be affected.
- 494. Defendant is without sufficient knowledge to admit or deny paragraph 494 and would demand strict proof if his rights are to be affected.
- 495. Defendant is without sufficient knowledge to admit or deny paragraph 495 and would demand strict proof if his rights are to be affected.
- 496. Defendant is without sufficient knowledge to admit or deny paragraph 496 and would demand strict proof if his rights are to be affected.
- 497. Defendant is without sufficient knowledge to admit or deny paragraph 497 and would demand strict proof if his rights are to be affected.
- 498. Defendant is without sufficient knowledge to admit or deny paragraph 498 and would demand strict proof if his rights are to be affected.
- 499. Defendant is without sufficient knowledge to admit or deny paragraph 499 and would demand strict proof if his rights are to be affected.

500. Defendant is without sufficient knowledge to admit or deny paragraph 500 and would demand strict proof if his rights are to be affected.

COUNT X – 42 U.S.C. §1983- Fourth Amendment Violation: Failure to Intervene to Prevent Excessive Force

Plaintiff v. Demetrius Haley, in his individual capacity

501. Paragraph 501 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

502. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

503. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

504. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

505. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

506. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

507. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

508. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

509. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

510. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
511. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
512. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
513. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
514. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
515. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
516. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
517. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
518. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
519. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.
520. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

521. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

522. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

523. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

524. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

525. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

526. Defendant is without sufficient knowledge to admit or deny paragraph 4 and would demand strict proof if his rights are to be affected.

COUNT XI – 42 U.S.C. §1983 – Fourth Amendment Violation: Excessive Force
Plaintiff v. Justin Smith, in his individual capacity

527. Paragraph 527 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

528. Defendant is without sufficient knowledge to admit or deny paragraph 528 and would demand strict proof if his rights are to be affected.

529. Defendant is without sufficient knowledge to admit or deny paragraph 529 and would demand strict proof if his rights are to be affected.

530. Defendant is without sufficient knowledge to admit or deny paragraph 530 and would demand strict proof if his rights are to be affected.

531. Defendant is without sufficient knowledge to admit or deny paragraph 531 and would demand strict proof if his rights are to be affected.

- 532. Defendant is without sufficient knowledge to admit or deny paragraph 532 and would demand strict proof if his rights are to be affected.
- 533. Defendant is without sufficient knowledge to admit or deny paragraph 533 and would demand strict proof if his rights are to be affected.
- 534. Defendant is without sufficient knowledge to admit or deny paragraph 534 and would demand strict proof if his rights are to be affected.
- 535. Defendant is without sufficient knowledge to admit or deny paragraph 535 and would demand strict proof if his rights are to be affected.
- 536. Defendant is without sufficient knowledge to admit or deny paragraph 536 and would demand strict proof if his rights are to be affected.
- 537. Defendant is without sufficient knowledge to admit or deny paragraph 537 and would demand strict proof if his rights are to be affected.
- 538. Defendant is without sufficient knowledge to admit or deny paragraph 538 and would demand strict proof if his rights are to be affected.
- 539. Defendant is without sufficient knowledge to admit or deny paragraph 539 and would demand strict proof if his rights are to be affected.
- 540. Defendant is without sufficient knowledge to admit or deny paragraph 540 and would demand strict proof if his rights are to be affected.
- 541. Defendant is without sufficient knowledge to admit or deny paragraph 541 and would demand strict proof if his rights are to be affected.
- 542. Defendant is without sufficient knowledge to admit or deny paragraph 542 and would demand strict proof if his rights are to be affected.

- 543. Defendant is without sufficient knowledge to admit or deny paragraph 543 and would demand strict proof if his rights are to be affected.
- 544. Defendant is without sufficient knowledge to admit or deny paragraph 544 and would demand strict proof if his rights are to be affected.
- 545. Defendant is without sufficient knowledge to admit or deny paragraph 545 and would demand strict proof if his rights are to be affected.
- 546. Defendant is without sufficient knowledge to admit or deny paragraph 546 and would demand strict proof if his rights are to be affected.
- 547. Defendant is without sufficient knowledge to admit or deny paragraph 547 and would demand strict proof if his rights are to be affected.
- 548. Defendant is without sufficient knowledge to admit or deny paragraph 548 and would demand strict proof if his rights are to be affected.
- 549. Defendant is without sufficient knowledge to admit or deny paragraph 549 and would demand strict proof if his rights are to be affected.
- 550. Defendant is without sufficient knowledge to admit or deny paragraph 550 and would demand strict proof if his rights are to be affected.
- 551. Defendant is without sufficient knowledge to admit or deny paragraph 551 and would demand strict proof if his rights are to be affected.
- 552. Defendant is without sufficient knowledge to admit or deny paragraph 552 and would demand strict proof if his rights are to be affected.
- 553. Defendant is without sufficient knowledge to admit or deny paragraph 553 and would demand strict proof if his rights are to be affected.

554. Defendant is without sufficient knowledge to admit or deny paragraph 554 and would demand strict proof if his rights are to be affected.

COUNT XII – 42 U.S.C. §1983 – Fourth Amendment Violation: Failure to Intervene to Prevent Excessive Force

Plaintiff v. Justin Smith, in his individual capacity

555. Paragraph 555 does not require a response. To the extent a response is required, Defendant incorporates his responses to paragraphs 1-293.

556. Defendant is without sufficient knowledge to admit or deny paragraph 556 and would demand strict proof if his rights are to be affected.

557. Defendant is without sufficient knowledge to admit or deny paragraph 557 and would demand strict proof if his rights are to be affected.

558. Defendant is without sufficient knowledge to admit or deny paragraph 558 and would demand strict proof if his rights are to be affected.

559. Defendant is without sufficient knowledge to admit or deny paragraph 559 and would demand strict proof if his rights are to be affected.

560. Defendant is without sufficient knowledge to admit or deny paragraph 560 and would demand strict proof if his rights are to be affected.

561. Defendant is without sufficient knowledge to admit or deny paragraph 561 and would demand strict proof if his rights are to be affected.

562. Defendant is without sufficient knowledge to admit or deny paragraph 562 and would demand strict proof if his rights are to be affected.

563. Defendant is without sufficient knowledge to admit or deny paragraph 563 and would demand strict proof if his rights are to be affected.

564. Defendant is without sufficient knowledge to admit or deny paragraph 564 and would demand strict proof if his rights are to be affected.
565. Defendant is without sufficient knowledge to admit or deny paragraph 565 and would demand strict proof if his rights are to be affected.
566. Defendant is without sufficient knowledge to admit or deny paragraph 566 and would demand strict proof if his rights are to be affected.
567. Defendant is without sufficient knowledge to admit or deny paragraph 567 and would demand strict proof if his rights are to be affected.
568. Defendant is without sufficient knowledge to admit or deny paragraph 568 and would demand strict proof if his rights are to be affected.
569. Defendant is without sufficient knowledge to admit or deny paragraph 569 and would demand strict proof if his rights are to be affected.
570. Defendant is without sufficient knowledge to admit or deny paragraph 570 and would demand strict proof if his rights are to be affected.
571. Defendant is without sufficient knowledge to admit or deny paragraph 571 and would demand strict proof if his rights are to be affected.
572. Defendant is without sufficient knowledge to admit or deny paragraph 572 and would demand strict proof if his rights are to be affected.
573. Defendant is without sufficient knowledge to admit or deny paragraph 573 and would demand strict proof if his rights are to be affected.
574. Defendant is without sufficient knowledge to admit or deny paragraph 574 and would demand strict proof if his rights are to be affected.

575. Defendant is without sufficient knowledge to admit or deny paragraph 575 and would demand strict proof if his rights are to be affected.
576. Defendant is without sufficient knowledge to admit or deny paragraph 576 and would demand strict proof if his rights are to be affected.
577. Defendant is without sufficient knowledge to admit or deny paragraph 577 and would demand strict proof if his rights are to be affected.
578. Defendant is without sufficient knowledge to admit or deny paragraph 578 and would demand strict proof if his rights are to be affected.
579. Defendant is without sufficient knowledge to admit or deny paragraph 579 and would demand strict proof if his rights are to be affected.
580. Defendant is without sufficient knowledge to admit or deny paragraph 580 and would demand strict proof if his rights are to be affected.

COUNT XIII – 42 U.S.C. §1983 – Fourth Amendment Violation: Excessive Force
Plaintiff v. Desmond Mills, Jr., in his individual capacity

581. Paragraph 581 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
582. Defendant is without sufficient knowledge to admit or deny paragraph 582 and would demand strict proof if his rights are to be affected.
583. Defendant is without sufficient knowledge to admit or deny paragraph 583 and would demand strict proof if his rights are to be affected.
584. Defendant is without sufficient knowledge to admit or deny paragraph 584 and would demand strict proof if his rights are to be affected.
585. Defendant is without sufficient knowledge to admit or deny paragraph 585 and would demand strict proof if his rights are to be affected.

586. Defendant is without sufficient knowledge to admit or deny paragraph 586 and would demand strict proof if his rights are to be affected.
587. Defendant is without sufficient knowledge to admit or deny paragraph 587 and would demand strict proof if his rights are to be affected.
588. Defendant is without sufficient knowledge to admit or deny paragraph 588 and would demand strict proof if his rights are to be affected.
589. Defendant is without sufficient knowledge to admit or deny paragraph 589 and would demand strict proof if his rights are to be affected.
590. Defendant is without sufficient knowledge to admit or deny paragraph 590 and would demand strict proof if his rights are to be affected.
591. Defendant is without sufficient knowledge to admit or deny paragraph 591 and would demand strict proof if his rights are to be affected.
592. Defendant is without sufficient knowledge to admit or deny paragraph 592 and would demand strict proof if his rights are to be affected.
593. Defendant is without sufficient knowledge to admit or deny paragraph 593 and would demand strict proof if his rights are to be affected.
594. Defendant is without sufficient knowledge to admit or deny paragraph 594 and would demand strict proof if his rights are to be affected.
595. Defendant is without sufficient knowledge to admit or deny paragraph 595 and would demand strict proof if his rights are to be affected.
596. Defendant is without sufficient knowledge to admit or deny paragraph 596 and would demand strict proof if his rights are to be affected.

597. Defendant is without sufficient knowledge to admit or deny paragraph 597 and would demand strict proof if his rights are to be affected.
598. Defendant is without sufficient knowledge to admit or deny paragraph 598 and would demand strict proof if his rights are to be affected.
599. Defendant is without sufficient knowledge to admit or deny paragraph 599 and would demand strict proof if his rights are to be affected.
600. Defendant is without sufficient knowledge to admit or deny paragraph 600 and would demand strict proof if his rights are to be affected.
601. Defendant is without sufficient knowledge to admit or deny paragraph 601 and would demand strict proof if his rights are to be affected.
602. Defendant is without sufficient knowledge to admit or deny paragraph 602 and would demand strict proof if his rights are to be affected.
603. Defendant is without sufficient knowledge to admit or deny paragraph 603 and would demand strict proof if his rights are to be affected.
604. Defendant is without sufficient knowledge to admit or deny paragraph 604 and would demand strict proof if his rights are to be affected.
605. Defendant is without sufficient knowledge to admit or deny paragraph 605 and would demand strict proof if his rights are to be affected.
606. Defendant is without sufficient knowledge to admit or deny paragraph 606 and would demand strict proof if his rights are to be affected.
607. Defendant is without sufficient knowledge to admit or deny paragraph 607 and would demand strict proof if his rights are to be affected.

608. Defendant is without sufficient knowledge to admit or deny paragraph 608 and would demand strict proof if his rights are to be affected.

COUNT XIV – 42 U.S.C. § 1983 – Fourth Amendment Violation: Failure to Intervene to Prevent Excessive Force

Plaintiff v. Desmond Mills, Jr., in his individual capacity

609. Paragraph 609 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

610. Defendant is without sufficient knowledge to admit or deny paragraph 610 and would demand strict proof if his rights are to be affected.

611. Defendant is without sufficient knowledge to admit or deny paragraph 611 and would demand strict proof if his rights are to be affected.

612. Defendant is without sufficient knowledge to admit or deny paragraph 612 and would demand strict proof if his rights are to be affected.

613. Defendant is without sufficient knowledge to admit or deny paragraph 613 and would demand strict proof if his rights are to be affected.

614. Defendant is without sufficient knowledge to admit or deny paragraph 614 and would demand strict proof if his rights are to be affected.

615. Defendant is without sufficient knowledge to admit or deny paragraph 615 and would demand strict proof if his rights are to be affected.

616. Defendant is without sufficient knowledge to admit or deny paragraph 616 and would demand strict proof if his rights are to be affected.

617. Defendant is without sufficient knowledge to admit or deny paragraph 617 and would demand strict proof if his rights are to be affected.

- 618. Defendant is without sufficient knowledge to admit or deny paragraph 618 and would demand strict proof if his rights are to be affected.
- 619. Defendant is without sufficient knowledge to admit or deny paragraph 619 and would demand strict proof if his rights are to be affected.
- 620. Defendant is without sufficient knowledge to admit or deny paragraph 620 and would demand strict proof if his rights are to be affected.
- 621. Defendant is without sufficient knowledge to admit or deny paragraph 621 and would demand strict proof if his rights are to be affected.
- 622. Defendant is without sufficient knowledge to admit or deny paragraph 622 and would demand strict proof if his rights are to be affected.
- 623. Defendant is without sufficient knowledge to admit or deny paragraph 623 and would demand strict proof if his rights are to be affected.
- 624. Defendant is without sufficient knowledge to admit or deny paragraph 624 and would demand strict proof if his rights are to be affected.
- 625. Defendant is without sufficient knowledge to admit or deny paragraph 625 and would demand strict proof if his rights are to be affected.
- 626. Defendant is without sufficient knowledge to admit or deny paragraph 626 and would demand strict proof if his rights are to be affected.
- 627. Defendant is without sufficient knowledge to admit or deny paragraph 627 and would demand strict proof if his rights are to be affected.
- 628. Defendant is without sufficient knowledge to admit or deny paragraph 628 and would demand strict proof if his rights are to be affected.

629. Defendant is without sufficient knowledge to admit or deny paragraph 629 and would demand strict proof if his rights are to be affected.

630. Defendant is without sufficient knowledge to admit or deny paragraph 630 and would demand strict proof if his rights are to be affected.

631. Defendant is without sufficient knowledge to admit or deny paragraph 631 and would demand strict proof if his rights are to be affected.

632. Defendant is without sufficient knowledge to admit or deny paragraph 632 and would demand strict proof if his rights are to be affected.

633. Defendant is without sufficient knowledge to admit or deny paragraph 633 and would demand strict proof if his rights are to be affected.

634. Defendant is without sufficient knowledge to admit or deny paragraph 634 and would demand strict proof if his rights are to be affected.

COUNT XV – 42 U.S.C. §1983 – Fourth Amendment Violation: Excessive Force
Plaintiff v. Tadarrius Bean, in his individual capacity

635. Paragraph 635 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

636. Defendant is without sufficient knowledge to admit or deny paragraph 636 and would demand strict proof if his rights are to be affected.

637. Defendant is without sufficient knowledge to admit or deny paragraph 637 and would demand strict proof if his rights are to be affected.

638. Defendant is without sufficient knowledge to admit or deny paragraph 638 and would demand strict proof if his rights are to be affected.

639. Defendant is without sufficient knowledge to admit or deny paragraph 639 and would demand strict proof if his rights are to be affected.

- 640. Defendant is without sufficient knowledge to admit or deny paragraph 640 and would demand strict proof if his rights are to be affected.
- 641. Defendant is without sufficient knowledge to admit or deny paragraph 641 and would demand strict proof if his rights are to be affected.
- 642. Defendant is without sufficient knowledge to admit or deny paragraph 642 and would demand strict proof if his rights are to be affected.
- 643. Defendant is without sufficient knowledge to admit or deny paragraph 643 and would demand strict proof if his rights are to be affected.
- 644. Defendant is without sufficient knowledge to admit or deny paragraph 644 and would demand strict proof if his rights are to be affected.
- 645. Defendant is without sufficient knowledge to admit or deny paragraph 645 and would demand strict proof if his rights are to be affected.
- 646. Defendant is without sufficient knowledge to admit or deny paragraph 646 and would demand strict proof if his rights are to be affected.
- 647. Defendant is without sufficient knowledge to admit or deny paragraph 647 and would demand strict proof if his rights are to be affected.
- 648. Defendant is without sufficient knowledge to admit or deny paragraph 648 and would demand strict proof if his rights are to be affected.
- 649. Defendant is without sufficient knowledge to admit or deny paragraph 649 and would demand strict proof if his rights are to be affected.
- 650. Defendant is without sufficient knowledge to admit or deny paragraph 650 and would demand strict proof if his rights are to be affected.

- 651. Defendant is without sufficient knowledge to admit or deny paragraph 651 and would demand strict proof if his rights are to be affected.
- 652. Defendant is without sufficient knowledge to admit or deny paragraph 652 and would demand strict proof if his rights are to be affected.
- 653. Defendant is without sufficient knowledge to admit or deny paragraph 653 and would demand strict proof if his rights are to be affected.
- 654. Defendant is without sufficient knowledge to admit or deny paragraph 654 and would demand strict proof if his rights are to be affected.
- 655. Defendant is without sufficient knowledge to admit or deny paragraph 655 and would demand strict proof if his rights are to be affected.
- 656. Defendant is without sufficient knowledge to admit or deny paragraph 656 and would demand strict proof if his rights are to be affected.
- 657. Defendant is without sufficient knowledge to admit or deny paragraph 657 and would demand strict proof if his rights are to be affected.
- 658. Defendant is without sufficient knowledge to admit or deny paragraph 658 and would demand strict proof if his rights are to be affected.
- 659. Defendant is without sufficient knowledge to admit or deny paragraph 659 and would demand strict proof if his rights are to be affected.
- 660. Defendant is without sufficient knowledge to admit or deny paragraph 660 and would demand strict proof if his rights are to be affected.
- 661. Defendant is without sufficient knowledge to admit or deny paragraph 661 and would demand strict proof if his rights are to be affected.

662. Defendant is without sufficient knowledge to admit or deny paragraph 662 and would demand strict proof if his rights are to be affected.

COUNT XVI – 42 U.S.C. § 1983- Fourth Amendment Violation: Failure to Intervene to Prevent Excessive Force

Plaintiff v. Tadarrius Bean, in his individual capacity

663. Paragraph 663 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

664. Defendant is without sufficient knowledge to admit or deny paragraph 664 and would demand strict proof if his rights are to be affected.

665. Defendant is without sufficient knowledge to admit or deny paragraph 665 and would demand strict proof if his rights are to be affected.

666. Defendant is without sufficient knowledge to admit or deny paragraph 666 and would demand strict proof if his rights are to be affected.

667. Defendant is without sufficient knowledge to admit or deny paragraph 667 and would demand strict proof if his rights are to be affected.

668. Defendant is without sufficient knowledge to admit or deny paragraph 668 and would demand strict proof if his rights are to be affected.

669. Defendant is without sufficient knowledge to admit or deny paragraph 669 and would demand strict proof if his rights are to be affected.

670. Defendant is without sufficient knowledge to admit or deny paragraph 670 and would demand strict proof if his rights are to be affected.

671. Defendant is without sufficient knowledge to admit or deny paragraph 671 and would demand strict proof if his rights are to be affected.

672. Defendant is without sufficient knowledge to admit or deny paragraph 672 and would demand strict proof if his rights are to be affected.
673. Defendant is without sufficient knowledge to admit or deny paragraph 673 and would demand strict proof if his rights are to be affected.
674. Defendant is without sufficient knowledge to admit or deny paragraph 674 and would demand strict proof if his rights are to be affected.
675. Defendant is without sufficient knowledge to admit or deny paragraph 675 and would demand strict proof if his rights are to be affected.
676. Defendant is without sufficient knowledge to admit or deny paragraph 676 and would demand strict proof if his rights are to be affected.
677. Defendant is without sufficient knowledge to admit or deny paragraph 677 and would demand strict proof if his rights are to be affected.
678. Defendant is without sufficient knowledge to admit or deny paragraph 678 and would demand strict proof if his rights are to be affected.
679. Defendant is without sufficient knowledge to admit or deny paragraph 679 and would demand strict proof if his rights are to be affected.
680. Defendant is without sufficient knowledge to admit or deny paragraph 680 and would demand strict proof if his rights are to be affected.
681. Defendant is without sufficient knowledge to admit or deny paragraph 681 and would demand strict proof if his rights are to be affected.
682. Defendant is without sufficient knowledge to admit or deny paragraph 682 and would demand strict proof if his rights are to be affected.

683. Defendant is without sufficient knowledge to admit or deny paragraph 683 and would demand strict proof if his rights are to be affected.
684. Defendant is without sufficient knowledge to admit or deny paragraph 684 and would demand strict proof if his rights are to be affected.
685. Defendant is without sufficient knowledge to admit or deny paragraph 685 and would demand strict proof if his rights are to be affected.
686. Defendant is without sufficient knowledge to admit or deny paragraph 686 and would demand strict proof if his rights are to be affected.
687. Defendant is without sufficient knowledge to admit or deny paragraph 687 and would demand strict proof if his rights are to be affected.
688. Defendant is without sufficient knowledge to admit or deny paragraph 688 and would demand strict proof if his rights are to be affected.

COUNT XVII - 42 U.S.C. §1983 – Fourth Amendment Violation: Unreasonable Stop
Plaintiff v. Preston Hemphill, in his individual capacity

689. Paragraph 689 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
690. Defendant is without sufficient knowledge to admit or deny paragraph 690 and would demand strict proof if his rights are to be affected.
691. Defendant is without sufficient knowledge to admit or deny paragraph 691 and would demand strict proof if his rights are to be affected.
692. Defendant is without sufficient knowledge to admit or deny paragraph 692 and would demand strict proof if his rights are to be affected.
693. Defendant is without sufficient knowledge to admit or deny paragraph 693 and would demand strict proof if his rights are to be affected.

694. Defendant is without sufficient knowledge to admit or deny paragraph 694 and would demand strict proof if his rights are to be affected.
695. Defendant is without sufficient knowledge to admit or deny paragraph 695 and would demand strict proof if his rights are to be affected.
696. Defendant is without sufficient knowledge to admit or deny paragraph 696 and would demand strict proof if his rights are to be affected.
697. Defendant is without sufficient knowledge to admit or deny paragraph 697 and would demand strict proof if his rights are to be affected.
698. Defendant is without sufficient knowledge to admit or deny paragraph 698 and would demand strict proof if his rights are to be affected.
699. Defendant is without sufficient knowledge to admit or deny paragraph 699 and would demand strict proof if his rights are to be affected.
700. Defendant is without sufficient knowledge to admit or deny paragraph 700 and would demand strict proof if his rights are to be affected.
701. Defendant is without sufficient knowledge to admit or deny paragraph 701 and would demand strict proof if his rights are to be affected.
702. Defendant is without sufficient knowledge to admit or deny paragraph 702 and would demand strict proof if his rights are to be affected.
703. Defendant is without sufficient knowledge to admit or deny paragraph 703 and would demand strict proof if his rights are to be affected.
704. Defendant is without sufficient knowledge to admit or deny paragraph 704 and would demand strict proof if his rights are to be affected.

705. Defendant is without sufficient knowledge to admit or deny paragraph 705 and would demand strict proof if his rights are to be affected.
706. Defendant is without sufficient knowledge to admit or deny paragraph 706 and would demand strict proof if his rights are to be affected.
707. Defendant is without sufficient knowledge to admit or deny paragraph 707 and would demand strict proof if his rights are to be affected.
708. Defendant is without sufficient knowledge to admit or deny paragraph 708 and would demand strict proof if his rights are to be affected.
709. Defendant is without sufficient knowledge to admit or deny paragraph 709 and would demand strict proof if his rights are to be affected.
710. Defendant is without sufficient knowledge to admit or deny paragraph 710 and would demand strict proof if his rights are to be affected.
711. Defendant is without sufficient knowledge to admit or deny paragraph 711 and would demand strict proof if his rights are to be affected.

COUNT XVIII – 42 U.S.C. § 1983- Fourth Amendment Violation: Excessive Force
Plaintiff v. Preston Hemphill, in his individual capacity

712. Paragraph 712 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
713. Defendant is without sufficient knowledge to admit or deny paragraph 713 and would demand strict proof if his rights are to be affected.
714. Defendant is without sufficient knowledge to admit or deny paragraph 714 and would demand strict proof if his rights are to be affected.
715. Defendant is without sufficient knowledge to admit or deny paragraph 715 and would demand strict proof if his rights are to be affected.

716. Defendant is without sufficient knowledge to admit or deny paragraph 716 and would demand strict proof if his rights are to be affected.
717. Defendant is without sufficient knowledge to admit or deny paragraph 717 and would demand strict proof if his rights are to be affected.
718. Defendant is without sufficient knowledge to admit or deny paragraph 718 and would demand strict proof if his rights are to be affected.
719. Defendant is without sufficient knowledge to admit or deny paragraph 719 and would demand strict proof if his rights are to be affected.
720. Defendant is without sufficient knowledge to admit or deny paragraph 720 and would demand strict proof if his rights are to be affected.
721. Defendant is without sufficient knowledge to admit or deny paragraph 721 and would demand strict proof if his rights are to be affected.
722. Defendant is without sufficient knowledge to admit or deny paragraph 722 and would demand strict proof if his rights are to be affected.
723. Defendant is without sufficient knowledge to admit or deny paragraph 723 and would demand strict proof if his rights are to be affected.
724. Defendant is without sufficient knowledge to admit or deny paragraph 724 and would demand strict proof if his rights are to be affected.
725. Defendant is without sufficient knowledge to admit or deny paragraph 725 and would demand strict proof if his rights are to be affected.
726. Defendant is without sufficient knowledge to admit or deny paragraph 726 and would demand strict proof if his rights are to be affected.

727. Defendant is without sufficient knowledge to admit or deny paragraph 727 and would demand strict proof if his rights are to be affected.
728. Defendant is without sufficient knowledge to admit or deny paragraph 728 and would demand strict proof if his rights are to be affected.
729. Defendant is without sufficient knowledge to admit or deny paragraph 729 and would demand strict proof if his rights are to be affected.
730. Defendant is without sufficient knowledge to admit or deny paragraph 730 and would demand strict proof if his rights are to be affected.
731. Defendant is without sufficient knowledge to admit or deny paragraph 731 and would demand strict proof if his rights are to be affected.
732. Defendant is without sufficient knowledge to admit or deny paragraph 732 and would demand strict proof if his rights are to be affected.
733. Defendant is without sufficient knowledge to admit or deny paragraph 733 and would demand strict proof if his rights are to be affected.
734. Defendant is without sufficient knowledge to admit or deny paragraph 734 and would demand strict proof if his rights are to be affected.
735. Defendant is without sufficient knowledge to admit or deny paragraph 735 and would demand strict proof if his rights are to be affected.
736. Defendant is without sufficient knowledge to admit or deny paragraph 736 and would demand strict proof if his rights are to be affected.
737. Defendant is without sufficient knowledge to admit or deny paragraph 737 and would demand strict proof if his rights are to be affected.

738. Defendant is without sufficient knowledge to admit or deny paragraph 738 and would demand strict proof if his rights are to be affected.

739. Defendant is without sufficient knowledge to admit or deny paragraph 739 and would demand strict proof if his rights are to be affected.

COUNT XIX – 42 U.S.C. § 1983 – Fourth Amendment Violation: Failure to Intervene to Prevent Excessive Force

Plaintiff v. Preston Hemphill, in his individual capacity

740. Paragraph 740 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

741. Defendant is without sufficient knowledge to admit or deny paragraph 741 and would demand strict proof if his rights are to be affected.

742. Defendant is without sufficient knowledge to admit or deny paragraph 742 and would demand strict proof if his rights are to be affected.

743. Defendant is without sufficient knowledge to admit or deny paragraph 743 and would demand strict proof if his rights are to be affected.

744. Defendant is without sufficient knowledge to admit or deny paragraph 744 and would demand strict proof if his rights are to be affected.

745. Defendant is without sufficient knowledge to admit or deny paragraph 745 and would demand strict proof if his rights are to be affected.

746. Defendant is without sufficient knowledge to admit or deny paragraph 746 and would demand strict proof if his rights are to be affected.

747. Defendant is without sufficient knowledge to admit or deny paragraph 747 and would demand strict proof if his rights are to be affected.

748. Defendant is without sufficient knowledge to admit or deny paragraph 748 and would demand strict proof if his rights are to be affected.
749. Defendant is without sufficient knowledge to admit or deny paragraph 749 and would demand strict proof if his rights are to be affected.
750. Defendant is without sufficient knowledge to admit or deny paragraph 750 and would demand strict proof if his rights are to be affected.
751. Defendant is without sufficient knowledge to admit or deny paragraph 751 and would demand strict proof if his rights are to be affected.
752. Defendant is without sufficient knowledge to admit or deny paragraph 752 and would demand strict proof if his rights are to be affected.
753. Defendant is without sufficient knowledge to admit or deny paragraph 753 and would demand strict proof if his rights are to be affected.
754. Defendant is without sufficient knowledge to admit or deny paragraph 754 and would demand strict proof if his rights are to be affected.
755. Defendant is without sufficient knowledge to admit or deny paragraph 755 and would demand strict proof if his rights are to be affected.
756. Defendant is without sufficient knowledge to admit or deny paragraph 756 and would demand strict proof if his rights are to be affected.
757. Defendant is without sufficient knowledge to admit or deny paragraph 757 and would demand strict proof if his rights are to be affected.
758. Defendant is without sufficient knowledge to admit or deny paragraph 758 and would demand strict proof if his rights are to be affected.

759. Defendant is without sufficient knowledge to admit or deny paragraph 759 and would demand strict proof if his rights are to be affected.
760. Defendant is without sufficient knowledge to admit or deny paragraph 760 and would demand strict proof if his rights are to be affected.
761. Defendant is without sufficient knowledge to admit or deny paragraph 761 and would demand strict proof if his rights are to be affected.
762. Defendant is without sufficient knowledge to admit or deny paragraph 762 and would demand strict proof if his rights are to be affected.
763. Defendant is without sufficient knowledge to admit or deny paragraph 763 and would demand strict proof if his rights are to be affected.
764. Defendant is without sufficient knowledge to admit or deny paragraph 764 and would demand strict proof if his rights are to be affected.
765. Defendant is without sufficient knowledge to admit or deny paragraph 765 and would demand strict proof if his rights are to be affected.

COUNT XX – 42 U.S.C. §1983 – Fourteenth Amendment Violation of Deliberate Indifference to Serious Medical Needs

Plaintiff v. Robert Long in his individual capacity

766. Paragraph 766 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
767. Defendant admits that Robert Long was an EMT, but denies the remaining allegations in paragraph 767.
768. Defendant denies paragraph 768.
769. Defendant admits that Defendant Robert Long was employed by the City of Memphis but denies the remaining allegations in paragraph 769.

770. Defendant is without sufficient knowledge to admit or deny paragraph 770 and would demand strict proof if his rights are to be affected.
771. Defendant denies paragraph 771.
772. Defendant denies paragraph 772.
773. Defendant denies paragraph 773.
774. Defendant denies paragraph 774.
775. Defendant denies paragraph 775.
776. Defendant denies paragraph 776.
777. Defendant denies paragraph 777 as stated.
778. Defendant admits that Defendant Long assisted in placing Mr. Nichols on a stretcher and denies the remaining allegations in paragraph 778.
779. Defendant denies paragraph 779.
780. Defendant denies paragraph 780.
781. Defendant denies paragraph 781.
782. Defendant denies paragraph 782.
783. Defendant denies paragraph 783.
784. Defendant denies paragraph 784.
785. Defendant is without sufficient knowledge to admit or deny paragraph 785 and would demand strict proof if his rights are to be affected.
786. Defendant is without sufficient knowledge to admit or deny paragraph 786 and would demand strict proof if his rights are to be affected.
787. Defendant denies paragraph 787.

**COUNT XXI – 42 U.S.C. § 1983- Fourteenth Amendment Violation of
Deliberate Indifference to Serious Medical Needs**

Plaintiff v JaMichael Sandridge, in his individual capacity

788. Paragraph 788 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
789. Defendant denies paragraph 789.
790. Defendant denies paragraph 790.
791. Defendant admits paragraph 791.
792. Defendant admits the allegations in paragraph 792.
793. Defendant denies paragraph 793.
794. Defendant denies paragraph 794.
795. Defendant denies paragraph 795.
796. Defendant denies paragraph 796 as stated.
797. Defendant denies paragraph 797.
798. Defendant denies paragraph 798.
799. Defendant denies paragraph 799 as stated.
800. Defendant admits to assisting Mr. Nichols being placed on a stretcher, but denies the remaining allegations in paragraph 800.
801. Defendant denies paragraph 801.
802. Defendant denies paragraph 802.
803. Defendant denies paragraph 803.
804. Defendant denies paragraph 804.
805. Defendant denies paragraph 805.
806. Defendant denies paragraph 806.
807. Defendant denies paragraph 807.

808. Defendant denies paragraph 808.

809. Defendant is without sufficient knowledge to admit or deny paragraph 809 and would demand strict proof if his rights are to be affected.

**COUNT XXII – 42 U.S.C.S § 1983- Fourteenth Amendment Violation of
Deliberate Indifference to Serious Medical Needs**

Plaintiff v. Michelle Whitaker, in her individual capacity

810. Paragraph 810 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.

811. Defendant denies paragraph 811.

812. Defendant denies paragraph 812.

813. Defendant denies paragraph 813.

814. Defendant denies paragraph 814.

815. Defendant denies paragraph 815.

816. Defendant denies paragraph 816.

817. Defendant denies paragraph 817.

818. Defendant is without sufficient knowledge to admit or deny paragraph 818 and would demand strict proof if his rights are to be affected.

819. Defendant denies paragraph 819 as stated.

820. Defendant is without sufficient knowledge to admit or deny paragraph 820 and would demand strict proof if his rights are to be affected.

821. Defendant denies paragraph 821.

822. Defendant denies paragraph 822.

823. Defendant denies paragraph 823.

824. Defendant denies paragraph 824.

- 825. Defendant denies paragraph 825.
- 826. Defendant denies paragraph 826.
- 827. Defendant denies paragraph 827.
- 828. Defendant denies paragraph 828.
- 829. Defendant denies paragraph 829.
- 830. Defendant is without sufficient knowledge to admit or deny paragraph 830 and would demand strict proof if his rights are to be affected.
- 831. Defendant is without sufficient knowledge to admit or deny paragraph 831 and would demand strict proof if his rights are to be affected.
- 832. Defendant is without sufficient knowledge to admit or deny paragraph 834 and would demand strict proof if his rights are to be affected.
- 833. Defendant denies paragraph 833.

COUNT XXIII- Intentional Infliction of Emotion Distress

Plaintiff v. DeWayne Smith, Individually and as Agent of the City of Memphis

- 834. Paragraph 834 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
- 835. Defendant is without sufficient knowledge to admit or deny paragraph 835 and would demand strict proof if his rights are to be affected.
- 836. Defendant is without sufficient knowledge to admit or deny paragraph 836 and would demand strict proof if his rights are to be affected.
- 837. Defendant is without sufficient knowledge to admit or deny paragraph 837 and would demand strict proof if his rights are to be affected.
- 838. Defendant is without sufficient knowledge to admit or deny paragraph 838 and would demand strict proof if his rights are to be affected.

839. Defendant is without sufficient knowledge to admit or deny paragraph 839 and would demand strict proof if his rights are to be affected.
840. Defendant is without sufficient knowledge to admit or deny paragraph 840 and would demand strict proof if his rights are to be affected.
841. Defendant is without sufficient knowledge to admit or deny paragraph 841 and would demand strict proof if his rights are to be affected.
842. Defendant is without sufficient knowledge to admit or deny paragraph 842 and would demand strict proof if his rights are to be affected.
843. Defendant is without sufficient knowledge to admit or deny paragraph 843 and would demand strict proof if his rights are to be affected.
844. Defendant is without sufficient knowledge to admit or deny paragraph 844 and would demand strict proof if his rights are to be affected.

COUNT XXIV – Negligent Infliction of Emotional Distress

Plaintiff v. DeWayne Smith, Individually and as Agent of the City of Memphis

845. Paragraph 845 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
846. Defendant is without sufficient knowledge to admit or deny paragraph 846 and would demand strict proof if his rights are to be affected.
847. Defendant is without sufficient knowledge to admit or deny paragraph 847 and would demand strict proof if his rights are to be affected.
848. Defendant is without sufficient knowledge to admit or deny paragraph 848 and would demand strict proof if his rights are to be affected.
849. Defendant is without sufficient knowledge to admit or deny paragraph 849 and would demand strict proof if his rights are to be affected.

850. Defendant is without sufficient knowledge to admit or deny paragraph 850 and would demand strict proof if his rights are to be affected.
851. Defendant is without sufficient knowledge to admit or deny paragraph 851 and would demand strict proof if his rights are to be affected.
852. Defendant is without sufficient knowledge to admit or deny paragraph 852 and would demand strict proof if his rights are to be affected.
853. Defendant is without sufficient knowledge to admit or deny paragraph 853 and would demand strict proof if his rights are to be affected.
854. Defendant is without sufficient knowledge to admit or deny paragraph 854 and would demand strict proof if his rights are to be affected.
855. Defendant is without sufficient knowledge to admit or deny paragraph 855 and would demand strict proof if his rights are to be affected.
856. Defendant is without sufficient knowledge to admit or deny paragraph 856 and would demand strict proof if his rights are to be affected.
857. Defendant is without sufficient knowledge to admit or deny paragraph 857 and would demand strict proof if his rights are to be affected.

COUNT XXV – Fraudulent Misrepresentation

Plaintiff v. DeWayne Smith, Individually and as Agent of the City of Memphis

858. Paragraph 858 does not require a response. To the extent a response is required, Defendant incorporates his response to paragraphs 1-293.
859. Defendant is without sufficient knowledge to admit or deny paragraph 859 and would demand strict proof if his rights are to be affected.
860. Defendant is without sufficient knowledge to admit or deny paragraph 860 and would demand strict proof if his rights are to be affected.

861. Defendant is without sufficient knowledge to admit or deny paragraph 861 and would demand strict proof if his rights are to be affected.
862. Defendant is without sufficient knowledge to admit or deny paragraph 862 and would demand strict proof if his rights are to be affected.
863. Defendant is without sufficient knowledge to admit or deny paragraph 863 and would demand strict proof if his rights are to be affected.
864. Defendant is without sufficient knowledge to admit or deny paragraph 864 and would demand strict proof if his rights are to be affected.
865. Defendant is without sufficient knowledge to admit or deny paragraph 865 and would demand strict proof if his rights are to be affected.
866. Defendant is without sufficient knowledge to admit or deny paragraph 866 and would demand strict proof if his rights are to be affected.
867. Defendant is without sufficient knowledge to admit or deny paragraph 867 and would demand strict proof if his rights are to be affected.
868. Defendant is without sufficient knowledge to admit or deny paragraph 868 and would demand strict proof if his rights are to be affected.
869. Defendant is without sufficient knowledge to admit or deny paragraph 869 and would demand strict proof if his rights are to be affected.
870. Defendant is without sufficient knowledge to admit or deny paragraph 870 and would demand strict proof if his rights are to be affected.

PRAYERS FOR RELIEF

871. Defendant denies paragraph 871.

- 872. Defendant denies paragraph 872.
- 873. Defendant denies paragraph 873.
- 874. Defendant denies paragraph 874.
- 875. Defendant denies paragraph 875.
- 876. Defendant denies paragraph 876.
- 877. Defendant denies paragraph 877.
- 878. Defendant denies paragraph 878.
- 879. Defendant denies paragraph 879.
- 880. Defendant denies paragraph 880.
- 881. Defendant denies paragraph 881.
- 882. Defendant denies paragraph 882.
- 883. Defendant denies paragraph 883.
- 884. Defendant denies paragraph 884.
- 885. Defendant denies paragraph 885.
- 886. Defendant denies paragraph 886.
- 887. Defendant denies paragraph 887.
- 888. Defendant denies paragraph 888.
- 889. Defendant denies paragraph 889.
- 890. Defendant denies paragraph 890.
- 891. Defendant denies paragraph 891.
- 892. Defendant denies paragraph 892.
- 893. Defendant denies paragraph 893.
- 894. Defendant denies paragraph 894.

895. Defendant denies paragraph 895.

896. Defendant denies paragraph 896.

JURY DEMAND

897. Paragraph 897 is an assertion that does not require a response.

AFFIRMATIVE DEFENSES

1. Defendant Sandridge asserts that as to the allegations against him, Plaintiff fails to state a claim upon which relief can be granted.
2. Defendant Sandridge submits that pursuant to 42 U.S.C. § 1988, as well as the 2016 amendment of the Tennessee Governmental Torts Liability Act as set forth in Tenn. Code Ann. § 29-20-113, should he prevail in this action brought against him in his individual capacity, he is entitled to recover reasonable attorneys' fees and costs incurred in defending this claim.
3. Defendant Sandridge asserts that claims of negligence under state law that he is immune from liability for any negligence under the Tennessee Governmental Tort Liability Act.
4. Defendant Sandridge is entitled to qualified immunity to Plaintiff's claims.
5. Defendant Sandridge exercised a degree of care, skill and diligence ordinarily possessed and exercised by similar E.M.T.'s under the same or similar circumstances that were not found to have committed any negligence or breach of duty.
6. Defendant Sandridge asserts that Plaintiff's claim for punitive damages violates applicable law and Plaintiff is not entitled to any such damages.
7. Defendant Sandridge specifically reserves the right to raise and claim other and further defenses as may be necessary in the defense of this cause as discovery and investigation

of this matter continues, as well as any defenses raised by any hereinafter named co-defendants.

8. Defendant Sandridge asserts that 42 U.S.C. § 1983 does not apply to pre-trial medical care.

Respectfully Submitted,

/s/Laura E. Smittick #32374

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CERTIFICATE OF SERVICE

I, Laura E. Smittick, do hereby certify that a copy of the foregoing document has been filed via the Court's ECF/ECM system on the 17th day of May 2023 and as a result a copy has been sent to the following through the Court's ECF/ECM system.

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/s/Laura E. Smittick
Laura E. Smittick